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From: Paul Ruden <PRuden@astahq.com>
To: "secretary@fmc.gov" <secretary@fmc.gov>
Date: 3/17/03 1:00PM
Subject: Cruise Line Financial Responsibility Rules Docket 02-I 5

The American Society of Travel Agents submits the attached letter for filing in the above docket

Paul M. Ruden, Esq., CTC
Senior Vice President
Legal & Industry Affairs
American Society of Travel Agents, Inc
Alexandria, VA 22314

March 17, 2002

Mr. Bryant L. VanBrakle
Federal Maritime Commission
800 North Capitol Street, NW, Room 1046
Washington, D.C. 200573-0001

Re: Docket No. 02-15

Dear Mr. VanBrakle:

This letter states the position of the American Society of Travel Agents (ASTA) with regard to the proposed amendment to the Federal Maritime Commission (FMC) rules on passenger vessel financial responsibility under Sections 2 and 3 of Public Law 89-777.

With regard to FMC's passenger vessel operators' (PVO) financial responsibility requirements for nonperformance of transportation, ASTA believes that the revised rules for required coverage should more accurately reflect the PVO's level of exposure, currently measured by Unearned Passenger Revenue (UPR) and which generally reflects the PVO's size as determined by the total number of passenger berths. Consumers would benefit from a coverage requirement that is more directly correlated to the number of berths operated by a PVO and therefore its UPR. ASTA's recommendation is that the revised rules reflect this principle.

Respectfully submitted,

Paul M. Ruden
Senior Vice President
Legal & Industry Affairs